

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:)	CHAPTER 7
)	
COVENANT PARTNERS, L.P.,)	Case No. 14-17568 (SR)
)	
Debtor,)	
)	
)	
)	
GARY F. SEITZ, as Chapter 7 Trustee)	
of the Estate of Covenant Partners, L.P.)	
)	
Plaintiff,)	
v.)	Adversary Proceeding
)	No. 16-00226 (SR)
WILLIAM B. FRETZ, JR and)	
JOHN P. FREEMAN)	
Defendants.)	Hearing: January 11, 2017 @ 1:30 p.m.
)	

**PETER FRORER, FRORER PARTNERS, L.P., FRORER ASSOCIATES,
LLC, FCF CREDIT, INC. AND TRIPARTITE, LLC'S MOTION TO
QUASH AND/OR FOR PROTECTIVE ORDER**

AND NOW, come Peter Frorer (“**Mr. Frorer**”); FRORER PARTNERS, L.P. (“**Frorer Partners**”), FRORER ASSOCIATES, LLC (“**Frorer Assoc.**”), FCF CREDIT, INC. (“**FCF**” and together with Forer, Frorer Assoc. and Frorer Partners, collectively, “**Frorer**”), and TRIPARTITE, LLC (“**Tripartite**”) (all collectively the “**Movants**”), by and through their counsel, FELLHEIMER & EICHEN LLP, and move to quash and/or for protective order from the Subpoena upon Mark Carrow, CPA, individually and representative of Citrin Cooperman in the above-captioned Adversary Proceeding. Pursuant to FED. R. BANKR. P. 9016 and FED. R. CIV. P. 45(d) and in support of their Motion to Quash and/or for Protective Order, the Movants incorporate herein by reference the Brief filed contemporaneously herewith and the Exhibits attached thereto pursuant to FED. R. CIV. P. 10(c).

Respectfully submitted,

FELLHEIMER & EICHEN LLP

Dated: December 5, 2016

By: /s/ Alan S. Fellheimer

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